

## Remarks/Arguments

This Response is considered fully responsive to the Office Action mailed December 12, 2007. Claims 1-25 were pending in the application. Claims 1-25 stand rejected. In this Response, no claims have been amended, added, or cancelled. Reconsideration and reexamination are respectfully requested.

## Rejections Under 35 U.S.C. § 102

Claims 1-4, 7-10, 13-18 and 21-25 stand rejected under 35 U.S.C. §102(b) as being unpatentable over U.S. Patent Application Publication No. 2002/0169960 A1 by Iguchi, et al. ("Iguchi"). All rejections are respectfully traversed.

Independent claim 1 recites, *inter alia*, that the host interface will communicate over a data bus with the media controller, and that a connection for address-less transfer is established between the indicated virtual channel of the host interface and a corresponding virtual channel of the media controller. The interface 144 comprises the host interface and the media controller. Thus, the connection established is within Interface 144, shown in Fig. 2 of the present application (below). Independent claims 7 and 15 recite similar features.

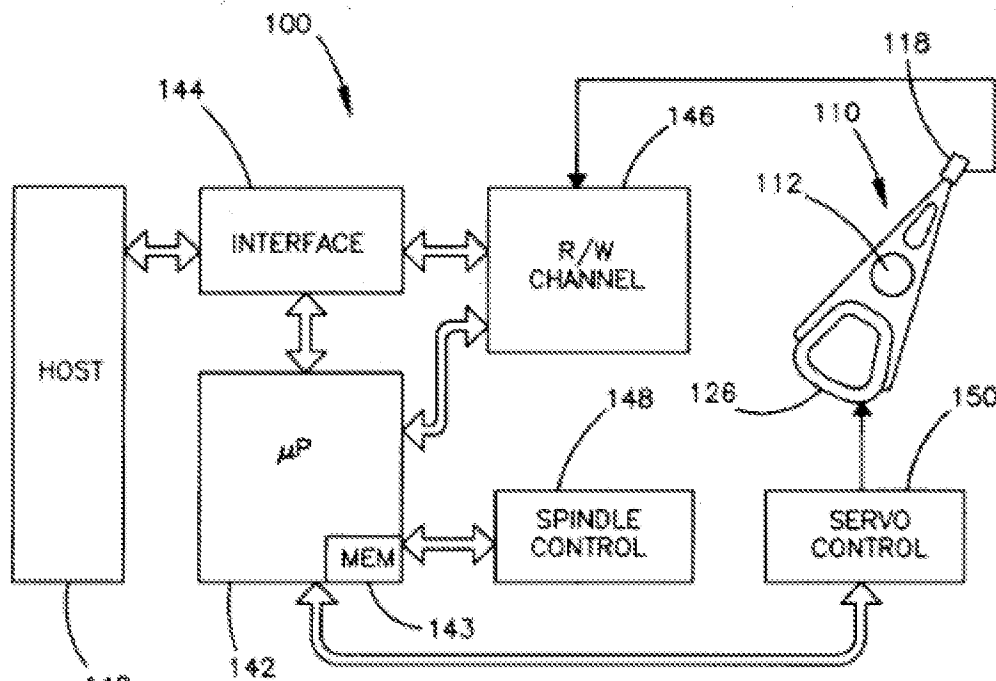


FIG. 2

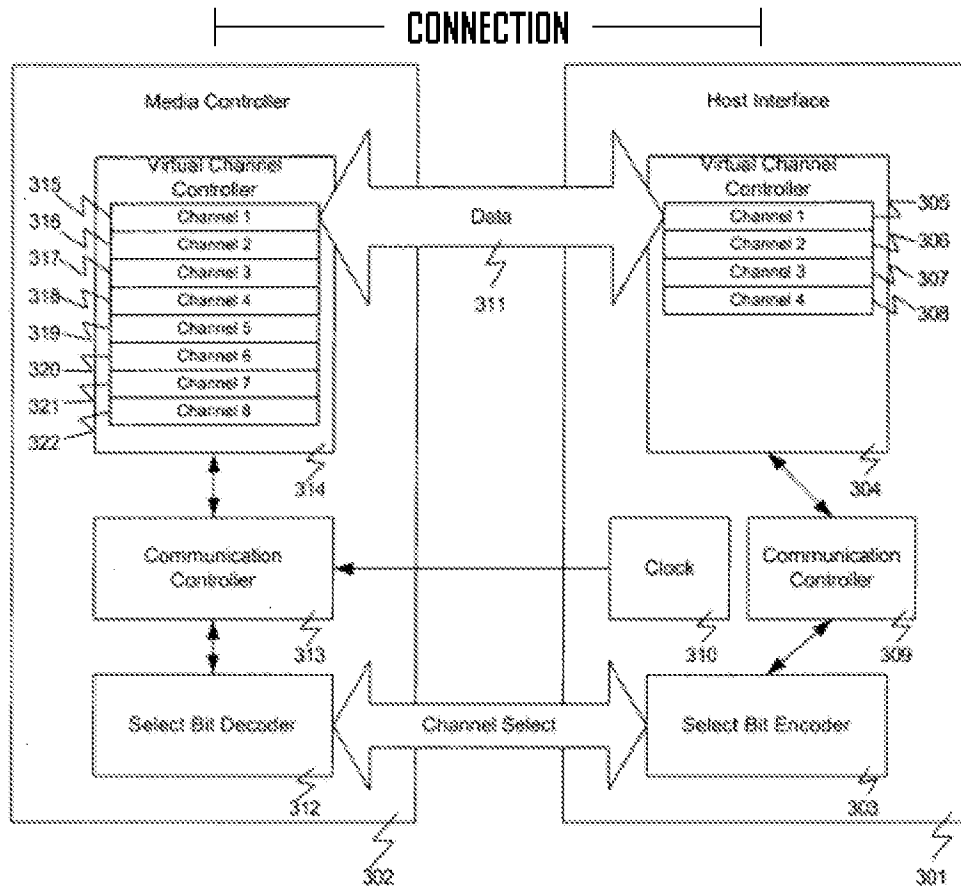
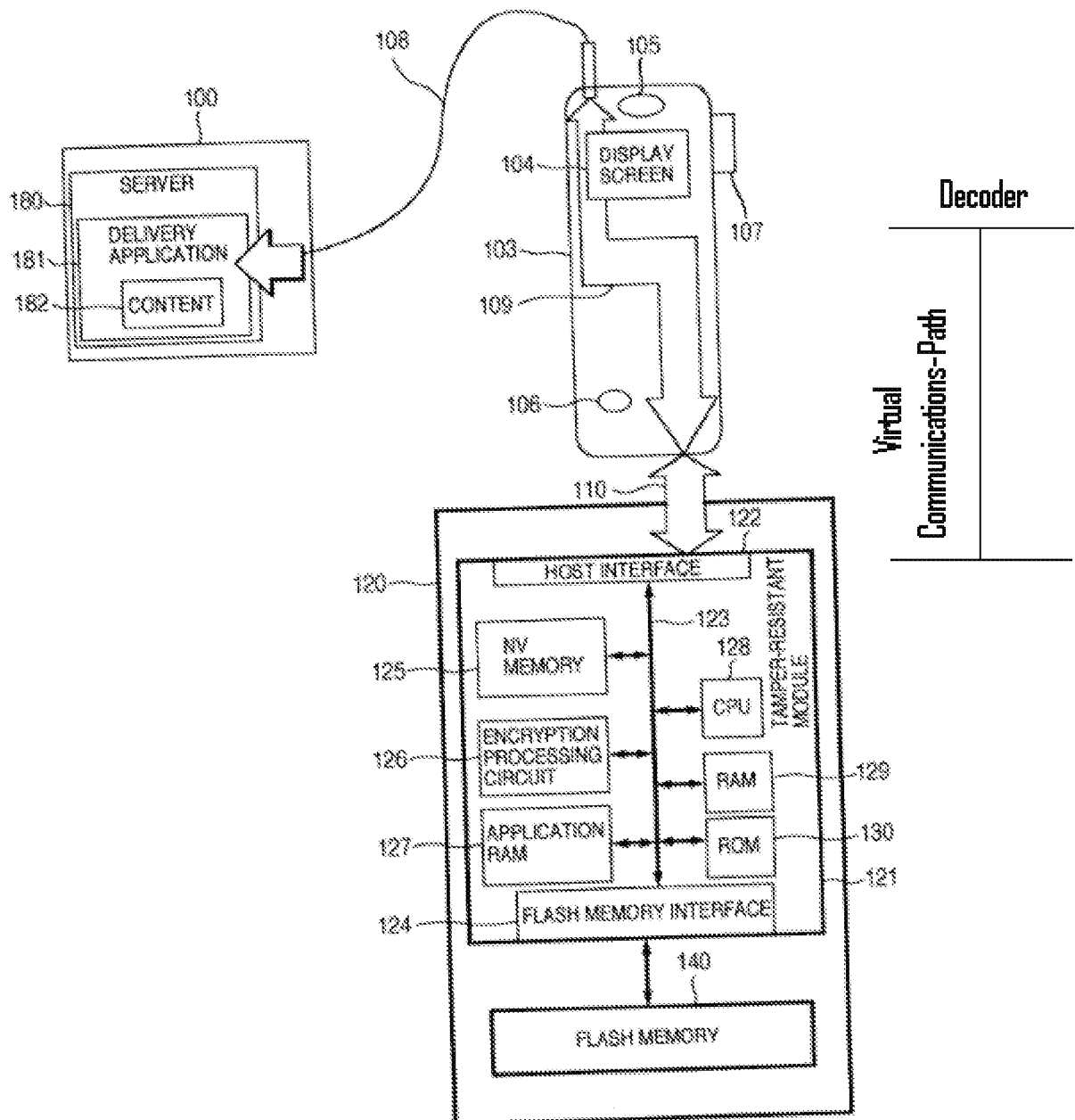


FIG. 3

Iguchi, in contrast, establishes a “virtual communications-path between the decoder circuit 206 and the storage device 120.” Iguchi at [0119]. The decoder circuit 206 is located within mobile terminal 103. Iguchi at Fig. 3. Thus, as shown below in FIG. 2, Iguchi creates a virtual communications-path between the decoder circuit in the mobile terminal (the host) 103 and the storage device 120.

FIG.2



Thus, in contrast to the virtual communications-path between the decoder and the storage device disclosed by Iguchi, independent claims 1, 7, and 15 each recite a connection between a host interface and a media controller. Accordingly, Applicants respectfully submit that Iguchi fails to disclose all of the features of independent claims 1, 7, and 15, and those claims depending directly or indirectly therefrom. Reconsideration and allowance of the claims is respectfully requested.

### **Rejections Under 35 U.S.C. § 103**

Claims 5, 11, and 19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Iguchi in view of U.S. Patent No. 6,763,405 to Sardo, et al. ("Sardo"). Claims 6, 12, and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Iguchi in view of U.S. Patent No. 5,790,811 to Hewitt ("Hewitt").

Applicants respectfully submit that neither Sardo nor Hewitt cures the deficiencies of Iguchi set forth above. Thus, without conceding the propriety of the asserted combinations, Applicants submit that the combinations of Iguchi and Sardo and Iguchi and Hewitt are likewise deficient. Accordingly, request reconsideration and withdrawal of the rejections of claims 5, 6, 11, 12, 19, and 20, and allowance of claims 5, 6, 11, 12, 19, and 20.

### **Conclusion**

Applicant has fully responded to each and every objection and rejection in the Office action dated December 12, 2007 and believes that claims 1-25 are in a condition for allowance. Therefore, Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Applicant believes no other fees or petitions are due with this filing. However, should any such fees or petitions be required, please consider this a request therefore and authorization to charge Deposit Account No. 50-3199 as necessary.

If the Office believes any issues could be resolved via a telephone interview, the Office is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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